

DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER
COMMISSIONER REDFORD
COMMISSIONER SMITH
COMMISSION SECRETARY
COMMISSION STAFF
LEGAL**

**FROM: NEIL PRICE
DEPUTY ATTORNEY GENERAL**

DATE: JANUARY 17, 2013

**SUBJECT: APPLICATION OF Q-LINK WIRELESS LLC FOR DESIGNATION AS
AN ELIGIBLE TELECOMMUNICATIONS CARRIER, CASE NO. QLW-
T-13-01**

On May 6, 2013, Q-Link Wireless LLC (“Company” or “Q-Link”) filed an Application pursuant to 47 U.S.C. § 214(e)(2), Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”), and the rules and regulations of the Idaho Public Utilities Commission (“Commission”) seeking designation as an eligible telecommunications carrier (“ETC”) in the State of Idaho for the sole purpose to provide Lifeline service to qualifying Idaho consumers.

Subsequently, Commission Staff (“Staff”) directed a series of production requests to Q-Link in order to obtain additional information regarding the Company’s operations and services. The Company responded with answers to Staff’s inquiries.

THE APPLICATION

Q-Link is a Delaware corporation with its principal business office located in Dania, Florida. Q-Link provides commercial mobile radio service (“CMRS”). The Company states that it provides prepaid wireless telecommunications services similar to TracFone, Inc. and Virgin Mobile USA, L.P. The Company utilizes the network and facilities of Sprint Spectrum, L.P. (“Sprint”) Network and Sprint Nextel. Q-Link attached a copy of its FCC-approved Compliance Plan, Exhibit 4, and granting forbearance to the FCC’s facilities requirement as a Lifeline only ETC. Q-Link commits to providing Lifeline service in Idaho in accordance with the Compliance Plan.

Q-Link has been designated as an ETC in Arizona, Colorado, Kansas, Kentucky, Maine, Maryland, Michigan, Minnesota, Missouri, Nevada, Ohio, Oklahoma, Pennsylvania, Texas, Utah, West Virginia, and Wisconsin. The Company has pending ETC applications in several other states.

Q-Link states that it markets its prepaid telecommunications services to low-income consumers. The Company offers three basic Lifeline plans to eligible non-Tribal customers and a single plan to eligible Tribal customers. Q-Link allows customers to purchase additional minutes by phone, on-line or through retail outlets. Q-Link's Lifeline plans include a free handset, Caller ID, Call Waiting, and Voicemail. A detailed description of the Company's Lifeline plans is attached to the Application as Exhibit 2.

In its Application, Q-Link states that it meets all of the Section 214 requirements for designation as an ETC. The Company believes that granting its Application would promote the public interest by providing a competitive choice for low-cost, high quality telecommunications services in Idaho. Q-Link states that its operations in Idaho will not unduly burden the USF. The Company will obtain compensation for eligible customers and adhere to the safeguards outlined in the Lifeline and Link-up Reform Order in order to minimize the likelihood of customers/households receiving duplicative support.

COMMISSION DECISION

Does the Commission wish to process Q-Link's Application for designation as an ETC through Modified Procedure with a corresponding 21-day comment period?



Neil Price
Deputy Attorney General

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